

**IN THE UNITED STATES BANKRUPTCY COURT
District of Puerto Rico**

In the Matter of:

RANDY TORRES RODRIGUEZ

Debtor(s)

Case No. **11-02007 SEK**

Chapter 13

MOTION OPPOSING DISMISSAL

TO THE HONORABLE COURT:

The undersigned, attorney for the above-named debtors, notifies the Court as follows,

1. Motion requesting dismissal filed by trustee is due on August 12, 2011.
2. As explained during the confirmation hearing held on July 29, 2009, debtor will need time until the bar date for government claims elapses (9/6/2011) in order to recalculate plan and comply with the amendments requested. Therefore we are requesting until September 15, to properly address the issues raised and correct them as necessary.

WHEREFORE, we respectfully request from this Honorable Court to take notice of the stated above and deny motion to dismiss.

I HEREBY CERTIFY, a copy of this motion has been electronically filed with the Clerk of the Court using the CM/ECF system that will send notice to the trustee and all other participants.

In Vega Baja, Puerto Rico, on this August 13, 2011.

/s/ Juan O. Calderon Lithgow
JUAN O. CALDERON LITHGOW
ATTORNEY FOR DEBTOR, 205607
PO BOX 1710
VEGA BAJA, PR 00694-1710
TEL.: 787-858-5476